

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Section 63.71 Application of)	WC Docket No. 19-_____
ConvergeOne Licensing Holdings, Inc.)	
)	

SECTION 63.71 APPLICATION

ConvergeOne Licensing Holdings, Inc. (“Applicant”) seeks authorization, pursuant to Section 214(a) of the Communications Act of 1934, as amended, and 47 C.F.R. Section 63.71, to discontinue the provision of all wireline telecommunications services and associated features (“Wireline Services”) to business customers in New York on September 30, 2019, or as soon thereafter as Commission approval can be obtained. Applicant does not provide wireline telecommunications services in any other state or jurisdiction.¹

Applicant provides the following information pursuant to Section 63.71 of the Commission’s Rules:

1. Name and Address of Carrier:

ConvergeOne Licensing Holdings, Inc.
1290 Avenue of the Americas
14th Floor
New York, NY 10014

2. Date of Planned Service Discontinuance, Reduction or Impairment:

Applicant plans to discontinue providing Wireline Services as of September 30, 2019, or as soon thereafter as Commission approval can be obtained.

¹ Applicant is separately filing a notification with the FCC regarding its discontinuance of international telecommunications services.

3. Points of Geographic Areas of Service Affected:

Applicant plans to discontinue Wireline Services in New York. Specifically, the proposed discontinuance will affect approximately 400 business customers. Applicant does not provide wireline telecommunications services in any other state or jurisdiction.

4. Brief Description of Types of Service Affected:

Applicant plans to discontinue all Wireline Services to business customers. Applicant does not have any residential customers.

Applicant submits this application for automatic approval under 47 C.F.R. § 63.71(f) as a non-dominant carrier. Applicant provides a stand-alone interconnected voice over Internet protocol (“VoIP”) service throughout its New York service area. In addition, at least one other alternative stand-alone facilities-based wireline or wireless voice service is available from another unaffiliated provider through the affected service area.

5. Brief Description of Dates and Methods of Notice to All Affected Customers:

Applicant provided written customer notice of the planned discontinuance in accordance with the requirements of Section 63.71(a) of the Commission’s Rules. The notice was sent to all affected customers via electronic email on August 30, 2019. A copy of the notice is appended hereto as Exhibit A. A copy of this Application has also been sent to the relevant state regulatory agency, governor’s office and the Department of Defense, as required under Section 63.71, concurrent with this filing, as set forth in the attached Certificate of Service.

6. Non-Dominance of the Carrier With Respect to the Service to be Discontinued:

Applicant is non-dominant with respect to the services to be discontinued.

WHEREFORE, the public convenience and necessity will not be adversely affected by the proposed discontinuance of services described herein. Applicant has provided the requisite notice

to all of its business customers, which have access to several other substitute services. Accordingly, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U. S. C. Section 214, and Section 63.71 of the Commission's Rules, Applicant respectfully requests Commission approval of this Application.

Respectfully submitted,

By: /s/ Danielle Burt
Russell M. Blau
Danielle Burt
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004-2541
202-739-3000 (Tel)
202-739-3001 (Fax)
russell.blau@morganlewis.com
danielle.burt@morganlewis.com

Counsel to Applicant

Dated: September 5, 2019

CERTIFICATE OF SERVICE

I, Danielle Burt, certify that on this 5th day of September, 2019, the foregoing Section 63.71 Application of ConvergeOne Licensing Holdings, LLC was sent via first class mail, postage prepaid, to the following persons listed below.

Governor Andrew M. Cuomo
Office of the Governor
NYS State Capitol Building
Albany, NY 12224

New York Public Service Commission
Agency Building 3
Three Empire State Plaza
Albany, NY 12223-1350

Secretary of Defense
Attn: Special Assistant for Telecommunications
Pentagon
Washington, D.C. 20301

/s/ Danielle Burt

Exhibit A

Customer Notice



Date August 30th, 2019

Re: Discontinuance of ConvergeOne Wireline Telecommunications Services

Dear Valued Customer:

On September 30, 2019, or as soon thereafter as the necessary regulatory approvals can be obtained, ConvergeOne Licensing Holdings, Inc. f/k/a ConvergeOne Technologies Utilities, Inc., a subsidiary of ConvergeOne Technology Solutions, Inc. ("ConvergeOne"), will no longer provide wireline telecommunications services in the State of New York. At ConvergeOne, we are always looking to improve service quality and take advantage of current technologies to reduce any risk to system availability. Coming in the next few months is an upgrade to our system to replace TDM circuits with VoIP technology. This upgrade will not affect any service levels or contractual obligations and will allow more options for additional opportunities for new features in the future. The specific wireline telecommunications services being discontinued include interstate and international telecommunications services using TDM circuits and all pricing plans associated with these services. This discontinuance does not impact any of the ConvergeOne VoIP equivalent services including SIP Trunking, SIP interstate, SIP international, SIP Toll Free, and SIP International Toll Free which will be offered at the same rates as you currently enjoy. Any future changes to the rates and terms and conditions of the ConvergeOne VoIP equivalent services will be made in accordance with your contract and applicable law.

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of ConvergeOne Licensing Holdings, Inc. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

If you have questions concerning this notice, please feel free to contact ConvergeOne at 212-282-2222. We thank you for your business and look forward to continuing to serve you in other capacities.

Sincerely,

John T Tarduno
ConvergeOne Licensing Holdings, Inc.
1290 Avenue of the Americas
14th Floor
New York, NY 10014

VERIFICATION

I, John Tarduno, state that I am an authorized representative of ConvergeOne Licensing Holdings, LLC, the Applicant in the foregoing *Section 63.71 Application of ConvergeOne Licensing Holdings, LLC*; that I am authorized to make this Verification on behalf of Applicant; that I have read the foregoing Application and know the contents thereof; and that the same are true and correct to the best of my knowledge, information and belief and are made in good faith.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of September, 2019.

ConvergeOne Licensing Holdings, LLC

A handwritten signature in black ink, appearing to read 'John Tarduno', is written over a horizontal line.

By: John Tarduno
Title: Vice President